# State of Wisconsin Government Accountability Board



# Preliminary Report on the Impacts and Costs of Eliminating





A Report by G.A.B. Staff

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#### I. Executive Summary

Permitting individuals to register to vote on Election Day, or to update their address or name as shown on their voter registration, has been a key feature of Wisconsin elections since 1976. If Election Day Registration (EDR) were to be eliminated, Wisconsin would immediately become subject to federal laws, including the National Voter Registration Act of 1993 (NVRA) and the Help America Vote Act of 2002 (HAVA). NVRA requires that voter registration take place at the Division of Motor Vehicles (DMV) as well as at agencies that provide federal or state public assistance or administer programs that primarily assist persons with disabilities.

This Report analyzes the anticipated impacts on the administration of Wisconsin elections and the procedures of several State agencies, if Wisconsin Statutes were amended to eliminate the opportunity for EDR. This Report also provides preliminary estimated costs related to additional responsibilities of the Government Accountability Board which would result from the elimination of EDR.

#### Highlights of this Report include:

- During major statewide elections, 10 15 percent of Wisconsin electors register to vote or update their voter registration on Election Day. Those registrants are required to present a driver license or other valid document establishing proof of their current residence.
- If EDR is eliminated, federal law would require Wisconsin to establish a system for offering voter registration services at the DMV and at agencies which provide public assistance or administer programs that assist persons with disabilities. Employees of those partner agencies would need to transmit voter registration applications and other voter data to the appropriate election officials.
- If EDR is eliminated, federal law would require poll workers to continue to allow voters who have moved within their jurisdiction to update their voter registration on Election Day and to cast a ballot. Poll workers would also be required to issue provisional ballots to individuals who do not appear on the poll list as qualified electors but who declare that they are registered voters, and possibly to individuals who have moved outside of their previous voting jurisdiction. Procedures for election officials to issue, process, and canvass provisional ballots are more complex and time-consuming than are those for regular ballots.
- If EDR is eliminated, the processes for maintaining the accuracy and currency of poll lists also would become more complex and costly. The names of voters who have moved and who have not voted in recent elections will remain on poll lists much longer than required under current Statutes. If EDR is eliminated, substantial technological changes would be required to the Statewide Voter Registration System as well as to facilitate the transfer of voter registration applications and other information from partner agencies to election officials.

- If EDR is eliminated, additional Government Accountability Board staff positions would be required to administer provisions of federal laws, coordinate voter registration activities with other State agencies, develop and implement IT solutions, provide training to local election officials and partner agencies, compile registration data and satisfy federal reporting requirements, and implement a public information and outreach program to educate the public about significant changes to voter registration procedures and provisional ballot rules.
- Preliminary cost estimates to implement the elimination of EDR and to administer the resulting federal law requirements would depend upon the specific provisions of any enabling legislation, which would need to include several key policy determinations. The G.A.B. staff has calculated preliminary cost estimates for its agency only over an initial two-year period to be \$5,193,796, as summarized in the table below.

Major Cost Areas	Cost
Voter List Maintenance	\$1,936,445
Information Technology	\$1,231,371
Training and G.A.B. Staffing	\$802,980
Public Education and Outreach Campaign	\$1,223,000
TOTAL G.A.B. PRELIMINARY COST*	\$5,193,796

<sup>\*</sup>Cost estimates for other State agencies will be provided in a final report.

#### **II.** Current Voter Registration Procedures

#### A. Registration Periods and History of Election Day Registration

Under current law, there are three different time periods during which eligible electors in Wisconsin can register to vote. The open registration period lasts until 20 days before an election, during which voters can register by mail, in person in their municipal clerk's office, or via special registration deputy. Nineteen days before an election until the Friday before an election is considered the late registration period where voter registration can only take place in the municipal clerk's office. Finally, voters in Wisconsin have the opportunity to register to vote at their polling place on Election Day, a process otherwise known as Election Day Registration (EDR).

Wisconsin has had EDR since 1976, when it was passed as part of a comprehensive legislative package making changes to the state's voter registration provisions. EDR was first used in the fall elections of 1976.

The Legislature made the following findings in the enacting of EDR:

The legislature finds that the vote is the single most critical act in our democratic system of government; that voter registration was not intended to and should not prevent voting; that registration should simply be a remedy against fraud and its burden should be placed upon administrators, not the electorate. The legislature further finds that it is extremely difficult for workers to find time to visit a registration office that is open only during working hours; that transportation costs to remote locations impede registration; and that the act of personal registration is a major cause of limited electoral participation. Therefore, pursuant to the policy of this state and nation to ensure all people the right to vote, the legislature finds it imperative to expand voter registration procedures.

-Section 1, Chapter 85, Laws of 1975.

Studies have shown that up to 33 percent of the population changes their address in any two-year period and that these recent movers make up 43 percent of all non-voters ("When Registration Barriers Fall, Who Votes? An Empirical Test of a Rational Choice Model," Craig L. Brians and Bernard Grofman, March 2001). In an increasingly mobile society the current system of allowing voters to register or update their voter registration on Election Day reinforces the findings articulated by the Legislature in establishing the current EDR procedures.

The current voter registration system in Wisconsin is a paper-based process, which presents numerous opportunities for mistakes in completing and processing registration forms. EDR offers eligible voters an opportunity to correct administrative mistakes made by the voter or election officials and to cast regular ballots. As a result, poll workers in Wisconsin and other EDR states issue exponentially fewer provisional ballots than states that do not allow EDR.

Under Wisconsin law, a voter registering on Election Day must provide a current identifying proof of residence document that shows the voter's full name and current address. The list of acceptable identifying documents is almost identical to the type of identification set out in the Help America Vote Act of 2002 (HAVA) for first-time voters who register by mail. This requirement has been in effect since EDR was established. Most individuals who register to vote on Election Day provide a current Wisconsin driver license or state ID card.

State law mandates that voter verification postcards are mailed to each voter who registered by mail, by Special Registration Deputy, or on Election Day. This process was established to curb fraudulent

registrations and verify that the newly-registered voter provided a valid address on their registration form. For voters who register by mail or Special Registration Deputy, if a verification postcard is returned as undeliverable, the municipal clerk should mail the voter a 30-day notice letter indicating that the postcard was returned, and give the voter 30 days to confirm their address. If the 30-day notice letter is also returned as undeliverable, or if the voter fails to respond within 30 days, that voter's record is inactivated in the Statewide Voter Registration System (SVRS).

For electors who register on Election Day, if the verification postcard is returned as undeliverable, the clerk immediately marks the voter record as inactive, sends the voter a notice informing them of the steps, and forwards the voter information to the District Attorney for investigation of potential voter fraud. When a voter record is marked as inactive, the voter's name will not appear on poll lists, and the voter would need to re-register in order to vote.

#### B. Voter Behavior and Turnout

Wisconsin has consistently ranked among the leading states for voter participation rates in national elections. Numerous recent academic studies indicate states that allow eligible voters to register or update their registration on Election Day generally experience higher voter turnout rates than states without EDR. These studies, while not able to identify the exact impact of EDR on voter turnout, posit that EDR boosts turnout by five to seven percentage points ("The Value of Election Day Registration," Burt Neuborne, November 2001).

In Wisconsin, the results from recent Fall General Elections have shown that on average 10–15 percent of all voters who cast ballots utilized EDR. With the high turnout at the 2008 Presidential and General Election, 459,549 Wisconsin voters, or 15.3 percent of all voters, registered or updated their voter registration at the polls on Election Day. For the June 5, 2012 Statewide Recall Election, 266,974 voters used EDR, which represented 10.6 percent of the electorate. Spring elections in Wisconsin historically experience lower voter turnout, as well as a lower percentage of voters utilizing EDR. Since 2009, the percentage of voters in Spring Primaries and Spring Elections using EDR ranged from 2.37 percent in April 2011 to 4.99 percent in April 2012 – which was also a Presidential Preference Primary Election. Voter turnout and utilization of EDR during Partisan Primaries are consistent with spring elections. Appendix A provides detailed voter turnout and registration statistics for all statewide elections since November 2008.

The 1976 EDR legislation stressed that "voter registration was not intended to and should not prevent voting" and that election administrators, not the electorate, should bear the burden of voter registration. In 2012 there continues to be an increased need to accommodate busy voters, particularly in light of the budgetary pressures at all levels of government. Because approximately 62 percent of municipal clerk positions in Wisconsin are part-time, voters in many municipalities have diminished opportunities to complete voter registration before Election Day. EDR addresses that problem and provides access to voter registration without increasing the administrative burdens on clerks which would result if a pre-election registration deadline were to be imposed.

Voters in Wisconsin have largely expressed satisfaction with the current registration system. A survey of Wisconsin voters following the 2008 Presidential and General Election by political scientists at the University of Wisconsin-Madison indicated that 99 percent of all voters responded that they were either 'somewhat satisfied' or 'very satisfied' with their voting experience (*Wisconsin Voter Experiences in the November 2008 General Election*, Barry C. Burden, November 2008). In addition, a study published in 2011 reported that although 55 percent of Wisconsin clerks believed that EDR increases the administrative burden on them, 60 percent of all surveyed clerks agreed that the benefits of EDR outweigh any administrative costs (*Early Voting and Election Day Registration In the Trenches: Local Officials' Perceptions of Election Reform*, Barry C. Burden, et al. 2011).

### III. Voter Registration and Provisional Ballot Procedures Upon Elimination of Election Day Registration

It is difficult to predict all of the impacts and the exact costs of eliminating Election Day Registration, with regard to the number of individuals who register to vote in an election cycle, the level of voter turnout, or the work of administering elections, particularly without the benefit of specific legislation to evaluate. However, due to provisions of two federal laws, some significant impacts and costs can be anticipated.

#### A. Compliance with Help America Vote Act of 2002 (HAVA)

First, of course, qualified electors will no longer have the ability to register to vote for the first time on Election Day, and possibly when appearing at the municipal clerk's office during in-person absentee voting, depending upon the provisions of any legislation. Municipal clerks and election inspectors would not need to process <u>new</u> registrants on Election Day. However, election officials would still need to train and prepare for processing registrations due to address changes within the jurisdiction and name changes. These duties on Election Day, along with the projected increase in provisional ballots would likely offset any savings from eliminating EDR for new voters.

Second, elimination of EDR would immediately subject Wisconsin to additional provisions of the Help America Vote Act of 2002 (HAVA). Section 302 of HAVA requires that states allow individuals to cast provisional ballots if they declare that they are registered voters but they do not appear on the poll list. Provisional ballots must also be issued if an election official asserts that an individual is not eligible to vote. In either case the individual must execute a written affirmation stating that the individual is a registered voter in the jurisdiction and is eligible to vote at the election to obtain a provisional ballot. The registration status of such individuals is subsequently verified and if the local election official determines that the individual was in fact validly registered, the ballot is counted.

To date, Wisconsin has been exempt from these provisional ballot requirements of HAVA because the State permits Election Day Registration. Currently, voters may cast a regular ballot after registering at the proper polling place, or updating their address, if they provide proof of residence. If EDR is eliminated, individuals claiming to be already registered but who are not on the poll list would be limited to casting a provisional ballot. The provisional ballot would be counted only if the municipal clerk subsequently determines that the individual was mistakenly omitted from the poll list. The standards for when provisional ballots are cast, and when they are counted, would need to be determined by legislation.

#### B. Compliance with National Voter Registration Act of 1993 (NVRA)

Third, elimination of EDR would require Wisconsin to comply with the extensive provisions of the National Voter Registration Act of 1993 (NVRA), also known as the Motor Voter Act. Wisconsin was one of six states which became exempt from NVRA because they either offer Election Day Registration or have no voter registration requirements. Those states include Idaho, Minnesota, New Hampshire, North Dakota, and Wyoming. The NVRA applies to elections for federal office, but states have extended its procedures to all elections in order to implement consistent practices.

The former State Elections Board initiated the request to Congress in 1993 which resulted in Wisconsin's EDR exemption from NVRA, and that request was also supported by the Governor and Wisconsin's Congressional delegation at the time. No State with EDR has subsequently eliminated that option and subjected itself to the requirements of NVRA (the State of Oregon eliminated EDR

via an initiative election in the 1980's, before the enactment of the NVRA). If EDR is eliminated in Wisconsin, the State's exemption from NVRA requirements could not be restored without Congressional action.

Following is a summary of the basic requirements of the NVRA as they would be applied to State agencies and local election officials:

- 1. The Department of Motor Vehicles (DMV) must offer the opportunity to register to vote during each transaction involving an individual's driver license or State ID card (including applications, renewals, and change of name or address), whether the transaction is conducted in person or via mail, telephone, or internet. The DMV license/ID card application must include a section to obtain voter registration information without duplicating information provided for the DMV product application or renewal, and it must contain an attestation by the voter.
- 2. A completed voter registration application accepted at the DMV must be transmitted to the appropriate State election official no later than 10 days after the date of acceptance (or no later than five days if it is accepted within five days of the voter registration deadline). The DMV may not require registrants to mail in the form themselves or discourage them from submitting the form to the DMV.
- 3. All offices in the State that provide either federal or State public assistance or State-funded programs primarily engaged in providing services to persons with disabilities must also offer voter registration services to persons who apply for the agency's assistance or services, seek recertification or renewal of services, or change their address. Programs primarily engaged in providing services to persons with disabilities include offices providing vocational rehabilitation, transportation, job training, education counseling, rehabilitation, and independent-living or at-home services for persons with disabilities.
- 4. Such agencies must provide voter registration applications as well as an information form, and must assist applicants at the agency in completing the voter registration form. Voter registration opportunities must be provided when the agency's services are accessed in-person, through the internet, or by telephone or mail. Within jurisdictions that are required under Section 203 of the Voting Rights Act to provide election materials in languages other than English, DMV and public assistance offices offering voter registration services must make those services and materials available in the alternative language. The City of Milwaukee is currently required to provide election materials in Spanish, and provide language assistance anywhere an election-related transaction takes place. Designated agencies are required to submit completed voter registration applications to the appropriate State election official under the same deadlines which are established for the DMV.

The State must also designate additional offices as voter registration agencies. Options include veterans' service offices, public libraries, public schools, colleges and universities, fishing and hunting license offices, and unemployment compensation offices.

5. All federal Armed Forces recruitment offices in Wisconsin must provide voter registration services.

- 6. NVRA states are required to establish a voter registration deadline of no later than 30 days before an election. The State may set a deadline within 30 days of an election but cannot establish a deadline prior to that date. Upon receipt of a completed registration application from any source, the appropriate State election official must send written notice to each applicant of the disposition of the application.
- 7. Each NVRA state must use and accept the National Mail Voter Registration form from voters. This form shall be made available for distribution through governmental and private entities, with particular emphasis on making them available for organized voter registration programs.
- 8. Under the NVRA, Wisconsin would be required to significantly alter its procedures for removing a person's name from the poll lists. An individual's voter registration may still be marked as inactive and the name removed from the poll list upon notification of the person's death, felony conviction, or mental incapacity. An individual's name may also be removed from the poll list at the voter's request. But NVRA states may not remove individuals from the voter registration list solely because of their failure to vote.
- 9. Absent the voter's request, a felony conviction, mental incapacity or death, a voter's name may be removed from the poll list in one of two ways. States may use the National Change of Address program (NCOA) or a general mailing to all voters to identify registrants whose address may have changed. In either case, the voter must also be sent a subsequent confirmation notice. If the voter fails to respond to the specific forwardable confirmation mailing, the voter's name may only be removed from the list of active voters if the voter fails to vote for two consecutive general elections after the confirmation notice is sent.
- 10. NVRA states may not conduct any program to systematically remove the names of ineligible voters from poll lists within 90 days of an election. The extended NVRA procedures for list maintenance would have the effect of keeping the names of inactive voters on the poll lists for a significantly longer period of time than currently provided under State law, reducing the accuracy and currency of the poll lists.
- 11. Pursuant to the NVRA, an eligible registered elector who has moved to an address in an area covered by the same polling place as the voter's previous address is entitled to vote at the same polling place even though they have not changed their registration status to reflect the address change. An eligible registered elector who has moved to an address covered by a different polling place but within the same registrar's jurisdiction must be permitted to correct the voting record and vote either at the old or the new polling place. Any legislation eliminating Election Day Registration would need to specify under what circumstances such individuals cast regular or provisional ballots, and define the jurisdiction in which addresses may be changed on Election Day, and determine the offices for which the individual may vote.
- 12. States and local election officials must keep most records concerning programs and activities conducted for the purpose of ensuring the accuracy and currency of registration lists for at least two years.

13. States must report various voter registration and list maintenance information to the U.S. Election Assistance Commission every two years. The reports must include the number of voter registration applications which were received by mail, by the DMV and agencies providing public assistance or offices providing programs serving persons with disabilities, by Armed Forces recruitment offices, and by other State-designated offices and agencies.

One primary result of implementing the provisions of HAVA and the NVRA would likely be a significant increase in both the type and number of provisional ballots cast in Wisconsin. Wisconsin policy historically has restricted the types of provisional ballots in order to provide certainty to voters, to streamline the procedures for counting and canvassing ballots, and to bring early resolution of election results.

Under current law, provisional ballots are issued and cast in only two situations. Provisional ballots are issued to first-time Wisconsin voters who register by mail and who fail to provide an acceptable proof of residence document. Provisional ballots are also issued to voters who register on Election Day and who have a driver license but do not provide the number of the license. (Under the Photo ID Law, which is currently enjoined by court order, voters who do not present an acceptable form of photo identification would also be issued a provisional ballot.) Provisional ballots are counted if the voter provides the required missing information by 4 p.m. on the Friday following the election.

In addition to these categories of provisional ballots, eliminating EDR would require new types of provisional ballots. HAVA requires provisional ballots to be issued to voters who declare they are registered but do not appear on the poll list, and if an election official asserts that an individual is not eligible to vote. Under NVRA, the Wisconsin Legislature would need to determine eligibility for a provisional ballot for voters who recently moved.

Wisconsin has historically had a low number of provisional ballots cast due to EDR and its resulting exemption from HAVA and NVRA requirements. Appendix B provides a comparison of provisional ballots cast, counted and rejected for Wisconsin and other states with comparable populations. In recent general elections, the number of provisional ballots in these states ranged from 641 ballots in Tennessee (2010) to 93,781 ballots in Washington (2004). In the same elections, Wisconsin municipal clerks reported the following number of provisional ballots:

- 374 provisional ballots in the 2004 Presidential and General Election
- 271 provisional ballots in the 2006 General Election
- 211 provisional ballots in the 2008 Presidential and General Election
- 64 provisional ballots in the 2010 General Election

The process of administering provisional ballots at the polling place and investigating the registration status of provisional voters is complex and time-consuming, as outlined in Section G.1. below and in Appendix D. A significant increase in provisional ballots may also require extending the deadlines for local election officials to complete their official canvass.

#### IV. Anticipated Impacts and Costs of Complying with HAVA and the NVRA

In this Preliminary Report, the Government Accountability Board staff attempts to outline the specific anticipated impacts and costs of eliminating Election Day Registration in Wisconsin and subjecting elections to the expanded federal HAVA and NVRA requirements. This Report provides broad parameters of the estimated increased fiscal impact on the G.A.B.'s budget due to administering such potential changes to Wisconsin law. The cost estimates are subject to substantial revision depending upon the substance of any specific legislation which may be introduced, and may be further refined in the Final Report which is expected to be released by the end of December 2012.

The G.A.B. has also asked the Department of Transportation's Division of Motor Vehicles and other State agencies which would be directly affected by the NVRA to identify anticipated impacts and costs for their operations. This Report attempts to outline the cost categories for these partner agencies, and the Taskforce will work to include estimated cost figures for those agencies in the Final Report.

#### A. Voter Registration at DMV Branches

The Wisconsin Division of Motor Vehicles operates 91 branch locations throughout the State, processing driver license and State Identification cards applications, renewals, and address changes in-person and by mail, telephone, and internet. In 2011, the DMV served approximately 2.6 million customers in person and conducted over 1.2 million transactions involving driver licenses or State ID cards. Also, 85,418 customers updated their addresses online in 2011, some of whom may also be included in the total of in-person transactions.

The DMV has developed a preliminary draft of the anticipated impacts on its operations if it becomes subject to the NVRA due to the elimination of Election Day Registration, which is attached as Appendix C. The impacts include changing application forms for driver licenses and identification cards, offering voter registration during online transactions, hiring additional staff, providing training, and transmitting voter registration forms and data to election officials.

The DMV draft summary of operational impacts illustrates that the calculation of reliable estimates depend upon the resolution of fundamental policy questions. Any legislation would need to address whether voter registration at NVRA locations will be conducted using a paper-based or an electronic system, or a combined system. G.A.B. staff concurs with the DMV that the preferred option is to enter and convey voter registration information electronically. Current statutes, however, do not permit complete online voter registration or the use of electronic signatures on voter registration forms. The DMV preliminary draft also makes several assumptions which would need to be evaluated in light of any proposed legislation and procedures established in cooperation with the G.A.B. and local election officials.

The DMV has provided a cost estimate for printing new forms of \$10,000 annually, and is working to develop cost estimates for the remaining staff, training, and IT changes which would be necessary. The Taskforce's Final Report will contain any additional cost estimates provided by the DMV.

#### B. Voter Registration at Public Assistance Agencies

NVRA requires agencies that provide federal or state public assistance, or services that primarily assist persons with disabilities, to also provide voter registration services. The G.A.B. has requested that the Departments of Health Services, Workforce Development, and Children and Families

analyze the anticipated impacts and costs due to their offices and programs potentially becoming subject to the NVRA. The Taskforce's Final Report will contain information provided by these partner agencies.

#### C. Voter Registration at Armed Forces Recruiting Offices

Under NVRA, all federal Armed Forces recruitment offices in Wisconsin must provide voter registration services. Current Wisconsin Statutes exempt members of the armed services from the requirement to register to vote, along with their spouses and dependents and other individuals included in the definition of military elector. Military voters must still submit sufficient information to request a ballot. In 2012, the Government Accountability Board developed and launched a new voter-focused website, My Vote Wisconsin (<a href="http://myvote.wi.gov">http://myvote.wi.gov</a>), that permits military electors to request and obtain a ballot online which is printed and then mailed to the appropriate municipal clerk. To date, therefore, the Government Accountability Board has not identified specific additional costs to the State or local governments as a result of this NVRA requirement.

#### D. Voter Registration List Maintenance

Currently, Wis. Stat. §6.50(1) and (2) establish a procedure for municipal clerks to remove voters from the active voter list solely on the basis of not having voted for two consecutive general elections. As part of the post-election audit, postcards are mailed to such voters requesting that the voter contact their municipal clerk if the voter wishes to remain on the list of active registered voters. If the mailing is returned undeliverable or if the voter does not respond within 30 days the voter's status is changed to inactive and the voter's name will not appear on future poll lists without re-registering.

States subject to the NVRA may not remove individuals from poll lists solely for failing to vote, and any systematic effort to remove inactive voters from poll lists must be completed 90 days or more before any federal election. Those NVRA provisions would require a number of changes to current state laws governing registration list maintenance. G.A.B. staff recommends that any statutory changes incorporate one of the following two options:

One option would establish an electronic interface with the National Change of Address database (NCOA), permitting an ongoing registration list maintenance process. Each registered voter identified by the NCOA with a new address would receive a notice requesting that they confirm their change of address. The NVRA requires that the notice is sent by first class mail and includes a postage paid return envelope. This would generate significantly greater mailing costs than the current postcard verification process, which takes advantage of reduced postal rates.

Any legislation would need to determine if the responsibility for generating and sending out the NVRA notices lies with the G.A.B. or with local election officials, and which level of government bears the cost for the notices. Local clerks would need to record the outcome of the mailings in the Statewide Voter Registration System (SVRS) as being either returned with an address correction or as undeliverable, and update addresses accordingly in SVRS. This process would involve high initial costs because programming staff would need to add another interface to SVRS, and to create the ability to automatically generate the notices. G.A.B. staff would need to design and test these functionalities. There would also be an ongoing cost to the G.A.B. for accessing NCOA data.

Another option would be to adapt the current system of voter list maintenance using mass mailings. Conducting systematic list maintenance procedures in June or July of odd-numbered years appears to be an optimal time to accommodate the 90-day restriction. However, an exemption would be needed to account for special elections, such as recall elections, that may be affected by the 90-day restriction.

While the G.A.B. currently mails postcards only to registered voters who have not voted in the past two general elections, NVRA specifies that voters may not be inactivated solely because of failure to vote, and that the notice to electors must be "uniform and non-discriminatory." NVRA guidelines issued by the U.S. Department of Justice suggest that such mailings must be sent to all registered voters. In addition, rather than removing a voter's name simply as a result of the post-election mailing audit, the voter must remain on the poll list for two general elections after failing to respond to the NVRA-required mailings after an election. Especially in jurisdictions with high voter turnover, this would create higher costs for printing poll lists that include voters that would not be listed under current law. This will also make it more difficult and take longer for poll workers to find voters because the poll books will be significantly larger.

The G.A.B. printed and mailed 313,205 verification postcards after the 2008 General Election, and 240,505 postcards after the 2010 General Election. A total of 173,451 voter names were marked as inactive and removed from future poll lists following the 2010 General Election because those individuals did not respond to the verification postcard mailing. The cost of printing and mailing the 2010 verification postcards was \$61,588. Because such a general mailing would need to be sent to all registered voters and would require first class postage, the cost would increase to \$1,184,000. The second mailing that would include a prepaid return envelope would cost an estimated \$555,000, based on an estimate of 20 percent of the first mailing returned undeliverable. The NVRA requires the second mailing to be sent by first class postage and include a pre-paid and pre-addressed return envelope.

In addition to the post-General Election verification mailing, the NVRA requires that all registrants must be notified of the disposition of their voter registration application. Currently, such postcards are sent to individuals who register by mail, through a special registration deputy or on Election Day. The NVRA requirement to send postcards to all registrants is estimated to cost \$98,722 per year, an increase of \$16,500 over the costs for the current registration verification mailings.

**Cost Items:** G.A.B. staff has not yet developed a cost estimate for using the NCOA system. The following table summarizes preliminary estimated costs for completing the voter registration verification mailings over a two-year election cycle as outlined in the second option described above.

NVRA General Mailing (3,700,000 x \$.32)	\$1,184,000 (every two years)
Second Mailing with Prepaid Return Envelope (740,000 x \$.75,	\$555,000 (every two years)
assuming 20 percent of the first mailing are undeliverable)	
Registration Verification Mailings	\$98,722.50 (per year)
Printing Costs	Not Available
G.A.B. PRELIMINARY COST	\$1,936,445 (every two years)

#### E. <u>Information Technology Impacts</u>

The elimination of EDR and implementation of NVRA would necessitate significant changes to several G.A.B. technology applications. The Statewide Voter Registration System (SVRS) would need to be modified to accommodate tracking additional information for reporting purposes. The online voter registration tool known as "Click and Mail" would need to be altered to indicate the location source for all registration applications created through that system. The G.A.B would also need to implement workflow changes to provide coordination and information-sharing with partner agencies that would become voter registration sites under NVRA.

#### 1. System Changes to Current G.A.B. Technical Applications

SVRS would need to be updated to allow local election officials to input the additional originating sources of voter registration applications, such as DMV, DHS, etc., so that the agency and physical location offering the registration opportunity could be tracked. The ability to track the number of customers who decline voter registration opportunities would also need to be added to SVRS. A training tracking module would need to be created to track the training hours of staff at partner agencies.

Voters who would be ineligible under current Wisconsin law, but cannot be removed from the poll list due to NVRA restrictions, would be designated as *Active-Suspended* in SVRS. A new workflow in SVRS would need to be created to track these voters and identify their status on the poll list. The SVRS would also need to be updated to generate and track mailings for new voter registrations, voter confirmation, and registration list maintenance mailings.

The G.A.B.'s recently-launched My Vote Wisconsin website would need to undergo substantial changes as well. The "Click and Mail" feature on the website would need to track the origination location of the voter registration form and whether that form was offered by a partner agency. The notifications feature of My Vote Wisconsin would need to be changed to alert the G.A.B. and the appropriate local election official that a voter registration form was generated through a partner agency.

In addition to the changes required by the NVRA, the statewide voter registration system would need to be updated to modify its capabilities related to the ability of voters to register on Election Day.

#### 2. Voter Registration Workflow Options

The NVRA requires the coordination between partner agencies, the State and local election officials to ensure that voter registration forms are processed accurately and in a timely manner. The G.A.B. is consulting with other states subject to the NVRA with similar populations to identify best practices and provide a cost analysis for different workflow options. In general, it appears that driver license agencies tend to implement systems that are more technology-based than other partner agencies which tend to rely more heavily on paper-based transactions.

Implementing a paper-based application system at other state agencies would have the least financial impact on the current election administration IT infrastructure in Wisconsin. However, the low IT costs associated with a paper-based system are likely offset by the higher administrative costs that would be incurred through the completion and transmission of paper voter registration applications and the data entry of new information ("Voter Registration in a Digital Age," Christopher Ponoroff, July 2010). Past experience also indicates that a paper-based system is also prone to administrative errors that could result in voters not appearing on the poll list through no fault of their own. With the elimination of the ability to fix administrative errors on Election Day through

EDR, an increased number of otherwise eligible voters likely would be forced to cast provisional ballots.

An alternative to having partner State agencies use a paper-based system would be creating a hybrid paper and online, or centralized online, system for voter registration. This workflow could use the current "Click and Mail" feature on the My Vote Wisconsin website to process requests online. The DMV and other agencies could refer their customers to the website to complete a voter registration form, print and sign the form, and turn it in to the referring agency. That agency would then forward the form to the election official responsible for finalizing the registration. The voter's registration information would be processed in SVRS using the same procedure as other "Click and Mail" applications. Due to the NVRA restriction on registrants entering duplicate information, this option would only be viable if a DMV employee entered the information for the registrant or if this process was not considered re-entering information under the NVRA.

The final workflow option would require full system integration between the SVRS and partner agency systems. While this option would carry the highest upfront IT costs, full system integration was identified by numerous other states subject to the NVRA as the most efficient manner to comply with the NVRA, minimize ongoing administrative costs and data entry errors, provide the most accurate poll lists, and provide the most reliable system for voters. Such a system could take various forms, but one primary alternative would be to build a web service through which an agency could send information from their system to the My Vote Wisconsin website to pre-populate voter information such as name, address, and contact information. For a more sophisticated operation, a XML service-oriented platform could be built and made available for agencies to transmit the voter registration information directly to the SVRS.

The adoption of one or more of these workflow options would require legislative changes, in addition to simply eliminating the option for voters to register on Election Day. Currently, a voter registration application requires an original signature before it can be processed and approved, and maintaining this requirement would restrict the ability to electronically transmit applications. In addition to the challenges surrounding the creation of an efficient and reliable workflow process, the major technological changes needed for the SVRS and the My Vote Wisconsin website would require additional IT staff and resources.

**Cost Items:** The following table summarizes preliminary estimates for G.A.B. to implement modifications to SVRS as well as of the two technology-based alternatives for coordination with all partner agencies, and additional needs for IT staff and resources. Cost estimates for other agencies are not available at this time. Each alternative involves policy choices regarding implementation time, expense, and efficiency. Please note that while some of these costs reflect start-up costs for implementing a new system, there would also be ongoing maintenance costs that would vary depending on the system choice.

Voter Registration Workflow IT Cost Alternatives	System Costs
Paper-based System	\$302,919
Hybrid Centralized Online System	\$322,469
Integrated Electronic System	\$1,231,371

#### F. Other Significant Election Administration Impacts

G.A.B. staff has identified a number of additional tasks that the agency and local election officials would need to complete if Election Day Registration (EDR) is eliminated and Wisconsin becomes subject to the NVRA and additional provisions of HAVA, including the following items.

#### 1. Government Accountability Board

The existing budget and staff level of the G.A.B. cannot absorb the new tasks and responsibilities which would result from the elimination of EDR. The impact on operations of the G.A.B. would involve the following areas:

The G.A.B. would need to create three positions for NVRA Elections Specialists responsible for serving as primary contacts regarding NVRA issues and procedures; updating training materials and webinars; working with an outside vendor to produce voter registration videos; coordinating voter registration activities with other State agencies; and providing public outreach and education.

The G.A.B. would also need to create two positions for NVRA program support, responsible for data entry of voter registration applications or processing and transmitting voter registration applications to municipal clerks; completing quality control review of voter registration applications; and compiling data for federal reporting requirements. These positions would also be responsible for assisting with increased contacts from voters, clerks, and partner agencies.

Current or new G.A.B. staff responsible for administering SVRS would need to develop training for the use of the agency's tool for reporting the source of voter registration forms and tracking provisional ballots. G.A.B. staff would also need to track the reporting system usage and update training materials. G.A.B. staff responsible for overseeing the administration of elections would need to revise forms, manuals and other G.A.B. documents and retrain local election officials who train other clerks. Because EDR has been an integral component of administering elections and affects many procedures before and after elections, eliminating EDR would affect nearly every form and manual produced by the Government Accountability Board and will require extensive revision and staff time.

If EDR were eliminated, the G.A.B. would expect an increased number of inquiries from clerks, state agency partners and the voting public in advance of registration deadlines. A substantial number of public inquiries are currently received in the last few days leading up to a statewide election. For the 2012 Presidential and General Election, 12,600 call contacts were received at the G.A.B. Customer Service Desk beginning October 7<sup>th</sup> through November 7<sup>th</sup> 2012. On Election Day the service desk received 1.6 calls per minute over the course of the 17-hour business day. These inquiries came primarily from the Wisconsin electorate who had questions about registration requirements, registration locations, EDR requirements, acceptable proof of residence documents, and other election-related inquiries.

The implementation of NVRA requirements would create an increased call volume from clerks, election officials, partner agencies as well as voters leading

up to any new registrations deadlines. For example, on Election Day the Customer Service Desk is operating at a significantly expanded capacity and similar call volume would be anticipated for any new registration deadlines. The institution of additional infrastructure and resources would be required if call volume were to increase due to any changes in election laws. While the number of additional calls is difficult to quantify, at least one state subject to the NVRA has found it necessary to employ an outside call center to deal with increased call volume around registration deadlines.

#### 2. Impacts to Workloads of Local Election Officials

Eliminating EDR in Wisconsin would create a number of changes in the responsibilities of local election officials. Election inspectors would not offer the opportunity for all individuals to register to vote at the polls. Only voters who need to change their name or update their address within the jurisdiction would be allowed to update their voter registration on Election Day. But any savings in time and resources are likely to be offset by additional tasks assigned to local election officials by the NVRA, and by the associated increased costs.

For example, prior to elections, local governments would need to purchase updated forms, manuals and notices, and municipal clerks' attendance at additional training would be required. Under the NVRA, the appropriate election official is required to send a notice to each individual who registers to vote advising them of the disposition of their registration application. Section IV. D. List Maintenance summarizes the cost of this mailing. Any enabling legislation requiring municipal clerks to complete this task would impose additional responsibilities and costs on municipalities.

To the extent that the elimination of EDR increases the number of individuals who register during the late registration period, municipal clerks may need to shift staff to process more registration applications in the clerk's office. The NVRA procedures for maintaining the voter registration list and poll lists would also involve more complex and time-consuming duties for municipal clerks. Because voters cannot be removed from the poll list solely for not voting, poll lists would include active voters and many voters who would otherwise be removed under current list maintenance procedures. When poll lists become larger, the printing costs increase, and municipal clerks are more inclined to split the lists at polling places, requiring additional election inspectors to manage the process and additional workers to be trained.

At polling places, election inspectors would need to continue to process address changes for individuals who moved within their jurisdiction and did not update their voter registration, as those individuals would still be entitled to vote even if EDR were to be eliminated. Poll workers would also see a significant increase in both the type and number of provisional ballots that must be processed. Many municipalities would likely face increased costs for printing ballots due to the need to provide paper ballots for provisional voting.

After elections, municipal clerks could expect significantly more cases requiring that they research the registration and eligibility status of voters who did not appear on the poll list and who voted provisionally to determine whether those provisional ballots should be counted. While many municipal boards of canvass

complete their duties on Election Night, it would become more common for boards to be required to meet after the election to process outstanding provisional ballots. Finally, municipal clerks would be required to track additional voter registration data and report new statistics on the GAB-190 Form after each election, as explained in greater detail under section IV. H. Oversight and Reporting Requirements.

Each of these new tasks would involve additional time, attention, and resources for local election officials, compared to the current statutory procedures. The G.A.B. is in the process of consulting with local officials and will include any further specific information about the anticipated impacts on their operations in its Final Report.

#### G. Training

The G.A.B. has a statutory duty to conduct regular informational and training meetings for county and municipal clerks and other election officials. Eliminating Election Day Registration would require extensive revisions of training for local election officials and new training for employees of other State agencies who would become involved in voter registration.

#### 1. Training of Local Election Officials

Eliminating EDR would require expansion of the current training of municipal clerks, chief inspectors and regular election inspectors to include new procedures for voter registration, provisional voting and ballot processing. Wisconsin's decentralized election administration system is defined by the following characteristics:

- 1,851 municipal clerks and 72 county clerks administer elections.
- Almost 3,000 polling places at presidential elections are staffed by approximately 30,000 election inspectors.
- Approximately 62 percent of Wisconsin municipal clerks work only on a part-time basis, some of whom fulfill their clerk duties by operating out of their residences.
- An estimated 72 municipal clerks do not have email access and a significant number also do not have high-speed internet access.

With a turnover rate among municipal clerks of approximately 25 percent every two years and an unknown, but probably equally high turnover rate among election inspectors, there are large numbers of clerks and election inspectors who would need initial training and retraining on the new Election Day procedures and pre- and post-election processes. Ongoing training would be necessary in a variety of formats to affect a real understanding of the details of new registration and voting procedures under the NVRA.

A minimum of four webinars for local election officials would be developed to address the following NVRA requirements:

- The Voter Registration Application
- Provisional Voting at the Polls on Election Day
- Voter Eligibility Issues at the Polls
- Processing Provisional Ballots

Similar to existing G.A.B. presentations, the webinars would consist of detailed PowerPoint presentations with accompanying narratives, polling place scenario demonstrations, and segments on troubleshooting at the polling place where appropriate. The G.A.B.'s team of certified clerk-trainers, who provide training for election inspectors and clerks locally, would also need extensive retraining to be qualified to present the training modules produced by the G.A.B.

Based upon statistics from states currently subject to the NVRA, a significant increase in the number of provisional ballots cast at the polls on Election Day and during in-person absentee voting would be anticipated. Extensive training for municipal clerks and election inspectors would be necessary because of the limited occurrence of provisional voting under current law. Election inspectors would need a thorough understanding of the law in order to issue provisional ballots correctly and answer questions from individuals who are likely to be upset because they believe their eligibility to vote is in question.

The provisional voting process is complex and instructions for issuing, processing, and canvassing provisional ballots contain multiple steps that are not required for regular ballots, as outlined in Appendix D. A polling place training aid would need to be developed, printed and distributed to local election officials to assist them in training their election inspectors on the new requirements and troubleshoot issues at the polls as they arise.

Municipal clerks are required to enter outstanding provisional ballots into the G.A.B.'s Customer Relationship Management (CRM) tool on election night. Clerks without internet access must provide this information to their SVRS providers (their county clerk or another municipality) to enter into the system.

Because the elimination of EDR is expected to increase the number of provisional ballots cast, clerks would need training on the use of the CRM. Current materials and a webcast would need to be updated. It is unknown what percentages of clerks enter this information as required on election night. With the number of provisional ballots becoming more significant, pressure will build for information on the status of provisional ballots to be available to each voter on My Vote Wisconsin.

To effectively train clerks on entering and tracking provisional ballot data, a new training module would be needed that would include screen shots, a business process PowerPoint, and interactive step-by-step instruction. Existing hard copy instructional materials would also require revision and augmentation.

Also, because most municipalities would be required to convene their Municipal Board of Canvass after the election to process provisional ballots, webinars and other materials related to canvassing would need to be updated and augmented. Finally, instructions and training relevant to tracking additional voter registration statistics would need to be developed.

The focus for training local election officials would be as follows:

- Training for county and municipal clerks would utilize communications via the G.A.B. website, conferences, webinars, updated training manuals and other materials.
- Training for chief election inspectors and other poll workers would focus
  on updating current baseline training, retraining certified clerk-trainers,
  developing webinars, updating manuals and providing polling place
  troubleshooting job aids.
- Training for members of local boards of canvass would incorporate stepby-step instructions, manuals, and webinars.

#### 2. Training of Partner Agencies

In the event Election Day Registration is eliminated G.A.B. staff would need to provide training to implement and coordinate the expansion of voter registration opportunities at DMV offices and public assistance agencies. These partner agencies would be required to distribute a voter registration application (or declination form) to their customers and clients, assist registrants to complete the application if requested, and accept the registration and promptly deliver it to the appropriate election officials.

Training of partner agency staff would differ depending on the voter registration application format used. Paper-based registration forms would be filled out by voters, submitted to state agency employees, and mailed to the election officials who enter the voter data into SVRS. Electronic formats or paperless voter registration systems would allow the partner agency employees to be guided through the registration form by prompts on a computer screen, enter the voter's information and send it directly to the appropriate clerk's attention through the SVRS database.

For example, some NVRA states use a version of the following process. A DMV worker follows an on-screen software template and gathers information for voting registration and driver license purposes in an electronic equivalent of the NVRA's required combined application form. Once verified by the applicant, the electronic information is sent to state and county election offices where it appears in their database and on their computer screens the following morning. Further data entry and transfer of handwritten information is minimized. The information has been sorted electronically and transmitted instantly. Printing and postage costs are all but eliminated.

If a paper-based registration process is utilized instead, a detailed training video would be developed to train voter registration providers on the data fields listed on the voter registration form, and help tags would be developed to answer questions or provide additional information. Under current law, municipal clerks process voter registration applications, and a significant issue to be determined by any legislation would be whether completed voter registration applications are transmitted to the G.A.B. or directly to the municipality for processing the application.

The focus for training of partner agencies would include communicating with agency division heads or their designees to facilitate an understanding of new

requirements and each agency's direct responsibilities under the NVRA to be incorporated into the agencies' core missions. Training for agency-designated NVRA lead contacts and agency line staff would include in-person training, developing "train-the-trainer" presentations and materials, instruction manuals for voter registration, webinars, detailed step-by-step and FAQ guides and video demonstrations. Similar training would be developed for the staff of any state and local agencies which are designated as additional voter registration agencies.

The approach to training partner agencies would be similar to training statewide Special Registration Deputies (SRDs). Statewide SRDs were eliminated in Wisconsin 2011 Act 23. Conducting voter registration through numerous offices of partner agencies would transform the registration process to a more decentralized system than that which existed with statewide SRDs, as municipal clerks would receive applications from many additional sources.

**Two-Year Cost Items:** The following table summarizes preliminary estimated costs for G.A.B. staff to conduct training of local election officials and partner agency personnel over an initial period of two years. Note that some of these costs will be ongoing.

Personnel	\$629,520
Staff Travel	\$19,500
Training and Reference Materials	\$153,960
G.A.B. PRELIMINARY COST	\$802,980

#### H. Oversight and Reporting Requirements

The NVRA requires states to report various voter registration and provisional ballot data to the U.S. Election Assistance Commission (EAC) every two years. Municipal clerks currently report some registration statistics through completion of the GAB-190 Form after each election. The G.A.B. completes portions of the EAC survey, but local election officials would need to track and report additional information. The G.A.B. would need to compile and transmit additional statewide statistics to the EAC. The G.A.B. would need to update the current reporting form to include data regarding the sources of voter registrations, the number of duplicate registrations, the number of invalid or rejected registrations, the number of removal notices sent to inactive voters, and the number of voters removed from poll lists, including the reasons for removal.

The NVRA also requires each state to track the total number of registration forms submitted. To meet the reporting requirements, a minimum of five application sources would need to be added to the GAB-190 Form. The four possible notices sent to document the disposition of the application (returned-confirmed, returned-invalidated, returned-undeliverable, status unknown) also would need to be tracked. The GAB-190 Form would need to also include a section for reporting the six reasons a voter could be removed from the voting list or marked as inactive. Any changes to the reporting of GAB-190 statistics would also require additional training requirements for clerks, their staffs, and G.A.B. staff. The collection of additional required information on the GAB-190 Form would also lead to an increase in time spent by clerks entering information for each election through the Wisconsin Election Data Collection System.

The cumulative efforts of partner agencies and local election officials are reflected in responses to the EAC survey every two years. That data may also be used to prompt inquiries regarding the effectiveness of the partner agencies in offering voter registration services and in adequately fulfilling their obligations under the NVRA. The U.S. Department of Justice monitors state compliance, conducts investigations, and files litigation to enforce the NVRA requirements. Private

parties may also bring litigation in federal court to enforce the NVRA. In recent years, several states have been sued and forced to defend the efforts of partner agencies in providing voter registration services, or to devote more resources to those efforts.

In short, eliminating EDR and implementing the NVRA allows for an additional avenue of federal oversight of Wisconsin elections. If litigation is initiated in federal court, partner agencies, such as the DMV or public assistance agencies, would likely be included as defendants and their procedures closely evaluated. It has been the experience of the G.A.B. that even when the litigation may not demonstrate significant substantive violations of federal statutes, additional data collection and reporting requirements may be imposed as part of or as a result of election-law litigation. For example, as a result of federal court consent decrees related to the compliance of municipal clerks with federal requirements to timely issue ballots to military and overseas voters, G.A.B. staff invested approximately 2,000 hours in 2012 simply to obtain data from clerks and assemble it into reports for the U.S. Department of Justice, significantly impacting the agency's ability to carry out its core duties and responsibilities.

#### I. Public Education and Outreach

A major change in Wisconsin's election law such as eliminating Election Day Registration would require a significant public information and outreach campaign to ensure that Wisconsin's 4.3 million eligible voters are prepared for upcoming elections. When the NVRA was enacted the federal legislation allowed for two years between its enactment and implementation dates. A similar timeframe may be necessary to incorporate the many changes required as a result of eliminating EDR and implementing the provisions of the NVRA.

The Legislature recognized the importance of educating the public and reaching out to voters most affected by the 2011 Wisconsin Act 23, the Voter Photo ID Law. The G.A.B. was required to conduct a public information campaign for the purpose of informing prospective voters of the new voter identification requirements. Act 23 also required the G.A.B. to engage in outreach to identify and contact groups of electors who may need assistance in obtaining or renewing a document that constitutes proof of identification for voting and provide assistance in obtaining or renewing that document.

The G.A.B. has developed cost estimates for a campaign to educate the public about the elimination of EDR, the need to register to vote in advance of an election, and opportunities to register at the DMV and public assistance agencies. The cost estimates are based on the G.A.B.'s experience in developing and deploying the "Bring It to the Ballot" public education and outreach campaign for Voter Photo ID in late 2011 and early 2012. Such a campaign would include development of outreach and educational materials for local election officials as well as state agency partners who will have new responsibilities under NVRA.

#### 1. Public Education Campaign

Because of the breadth and complexity of the required changes to Wisconsin law if EDR is eliminated, the G.A.B. staff believes a comprehensive public education campaign would be advisable. The new public education campaign would focus on raising awareness about changes to the law through a variety of media channels, as well as giving voters information about how and where to register to vote in advance of the election. The campaign would also educate voters about the rules related to provisional ballots and associated procedures under NVRA and HAVA.

The City of Milwaukee is currently subject to the provisions of the Voting Rights Act requiring election materials to be available in alternative languages, and therefore any public information campaign would need to include materials and electronic media messages produced in the Spanish language.

For the Photo ID public information campaign, the G.A.B. took advantage of a program of the Wisconsin Broadcasters Association (WBA) allowing for an economical paid public service announcement program under which WBA member TV and radio stations broadcast public service announcements for a discounted cost per week. These cost savings may or may not be available for future campaigns. If the WBA rates are not available, market rates would be significantly higher. Additionally, targeted print, outdoor and online advertising would need to be deployed.

The goal of the public information campaign would be to direct voters to the My Vote Wisconsin website, where they can check their voter registration status online, as well as to begin the registration process online, or update their information if necessary. My Vote Wisconsin currently provides limited educational materials for voters and limited navigation tools, and would need to be redesigned to handle the even greater traffic imposed by voters needing to check their voter registration status in advance to ensure they can participate on Election Day.

Voters without internet access could call the G.A.B.'s toll-free helpline for information about registration status. Citizens would also be encouraged to register to vote when conducting business at offices of the Wisconsin Division of Motor Vehicles as well as at state and county public assistance agencies and offices providing assistance to persons with disabilities, military recruiting offices, and other government offices designated by the Legislature as voter registration sites.

An additional option would be to send a statewide mailing to educate the public about changes in the registration and provisional ballot laws. The G.A.B. staff is researching options regarding the type and audience of the mailing.

#### 2. Public Outreach Campaign

Another aspect of informing the Wisconsin electorate about major changes in election law resulting from NVRA requirements would be educational events conducted by the G.A.B. These events would focus on raising awareness about major law changes by giving voters information about how, where, and when to register to vote in advance of registration deadlines. These in-person events would also educate voters about provisional ballot rules under NVRA and HAVA.

During the Photo ID campaign, the G.A.B. conducted nearly 200 in-person educational events with groups of voters and representatives of civic organizations throughout Wisconsin. The in-person educational events for new registration laws and NVRA requirements would operate in a similar fashion. The goal of the events would be to educate audiences who would then spread the information to others in their community.

To prepare voters for the new changes related to the implementation of the NVRA, the G.A.B. recommends conducting 270 in-person educational events. These voter outreach events would run for approximately 18 months after implementation of legislative changes, with an estimated 15 presentations per month. The in-person events would typically be one hour long and involve two G.A.B. staff speakers, and an effort would be made to reach all areas of the State. Informational packets and handouts would be provided to all participants at these outreach events, and this information would also be available to the public on the G.A.B. website.

**Two-Year Cost Items:** The following table summarizes preliminary estimated costs for public education and outreach related to the elimination of EDR over a period of two years. This table assumes advertising rates similar to those available under the WBA program. The table also does not include the cost for any potential statewide informational mailings, which could range from approximately \$500,000 to \$800,000.

Multimedia Design/Production	\$280,000
Public/Clerk/Partner Agency Outreach	\$260,000
TV/Radio Airtime – WBA	\$549,000
Multimedia Advertising	\$134,000
G.A.B. PRELIMINARY COST	\$1,223,000

#### V. Summary of Preliminary Estimated Cost

The cost items presented in this document are preliminary and a result of an initial review of new requirements that would take effect if Election Day registration were to be eliminated. The summary estimated cost of \$5,193,796 represents the impact that the elimination of EDR would have solely on the Government Accountability Board for the initial two years of implementation. This estimate does not include the costs that would be incurred by partner agencies, such as the Department of Motor Vehicles, Department of Health Services, Department of Children and Families, and Department of Workforce Development, which would be designated under NVRA to provide voter registration services to all of their customers.

This estimate is based on a two-year budget cycle and includes funding for all annual cost items for two years, in addition to one-time start-up costs. A two-year budget plan also coincides with the administration of an election cycle with one general election, and one mailing process for the voter registration list maintenance. Accordingly, this estimate contains costs for an 18-month public education and outreach program as well as funding for additional G.A.B. staff for those two years. Please note that not all of the costs listed in this document would expire once this budget cycle was complete and that there would be ongoing costs for G.A.B. personnel, IT support, public outreach, and clerk and partner agency training. In addition, the list maintenance costs would continue to be incurred on a biennial basis.

For this preliminary report, these costs have been provided to serve as a reference. The final report will contain more specific cost information, as well as cost information from the partner State agencies. The table below is a high-level summary of the cost estimates for eliminating EDR in Wisconsin.

Major Cost Areas and Sub-Categories	Category Cost	Total Cost
Voter List Maintenance		\$1,936,445
<b>NVRA General Mailing (3,700,000 x \$.32)</b>	\$1,184,000	Every Two Years
Second Mailing (740,000 x \$75)	\$555,000	Every Two Years
Registration Verification Mailings	\$197,445	Every Two Years
Printing Costs	Not Available	
Information Technology		\$1,231,371
SVRS Changes	\$ 79,250	
Centralized Online	\$19,550	
System Integration	\$908,902	
Hardware, Software, Maintenance, Support	\$223,669	
Training and G.A.B. Staffing		\$802,980
Personnel	\$629,520	
Staff Travel	\$19,500	
Materials	\$153,960	
Public Education and Outreach Campaign		\$1,223,000
Multimedia Design/Production	\$280,000	
Public/Clerk/Partner Agency Outreach	\$260,000	
TV/Radio Airtime – WBA	\$549,000	
Multimedia Advertising	\$134,000	
TOTAL G.A.B. PRELIMINARY COST		\$5,193,796

#### VI. Conclusion

As outlined in this Preliminary Report, the elimination of Election Day Registration would represent a significant change in the administration of elections in Wisconsin, and would impose many new responsibilities upon local election officials, the Government Accountability Board, and partner agencies which would be directly responsible to offer voter registration services under federal law. This Report is intended to provide policymakers, the Board, and the public with information necessary to evaluate the consequences that can be anticipated as a result of eliminating EDR. Whether the additional impacts and costs would be warranted as an effort to improve the current administration of elections is, of course, a policy decision to be made by elected officials.

The G.A.B. staff will continue to gather facts and conduct further analysis to supplement this Report, including seeking information from partner agencies in State government and local election officials about the impacts and costs of eliminating EDR. The G.A.B. expects to issue a Final Report on this topic by the end of December, 2012, and is available to respond to inquiries from the Legislature and other interested parties throughout the consideration of these issues.

#### Appendix A

# Wisconsin Voter Turnout and Registration Statistics (Major Statewide Elections are indicated in **Bold**)

		Voting Age			Closed	Percent Closed		Percent	Percent Closed
Date	Election	Population	Voters	Turnout	Registrants	Registrants	EDRs	EDRs	or EDR
November 6, 2012	Presidential and General Election*	4,378,741	3,071,434	70.14%	*	*	*	*	*
August 14, 2012	Partisan Primary	4,378,741	851,572	19.45%	26,913	3.16%	17,117	2.01%	5.17%
June 5, 2012	Recall Election	4,378,741	2,516,371	57.47%	23,623	0.94%	266,974	10.61%	11.55%
May 8, 2012	Recall Primary	4,378,741	1,360,750	31.08%	13,971	1.03%	67,031	4.93%	5.95%
April 3, 2012	Spring Election	4,378,741	1,144,351	26.13%	10,216	0.89%	57,158	4.99%	5.89%
February 21, 2012	Spring Primary	4,378,741	139,343	3.18%	2,083	1.49%	6,064	4.35%	5.85%
April 5, 2011	Spring Election	4,372,347	1,524,528	34.87%	14,579	0.96%	64,009	4.20%	5.15%
February 15, 2011	Spring Primary	4,372,347	444,986	10.18%	2,181	0.49%	17,951	4.03%	4.52%
November 2, 2010	General Election	4,372,347	2,185,017	49.97%	30,522	1.40%	230,330	10.54%	11.94%
September 14, 2010	Partisan Primary	4,372,347	930,511	21.28%	7,690	0.83%	60,632	6.52%	7.34%
April 6, 2010	Spring Election	4,372,347	574,130	13.13%	2,656	0.46%	31,675	5.52%	5.98%
February 16, 2010	Spring Primary	4,372,347	81,363	1.86%	314	0.39%	4,037	4.96%	5.35%
April 7, 2009	Spring Election	4,354,717	833,328	19.14%	3,621	0.43%	19,758	2.37%	2.81%
February 17, 2009	Spring Primary	4,354,717	288,307	6.62%	2,752	0.95%	14,650	5.08%	6.04%
November 4, 2008	Presidential and General Election	4,330,695	2,997,086	69.21%	115,968	3.87%	462,392	15.43%	19.30%

<sup>\*</sup>Registrations statistics for the November 6, 2012 Presidential and General Election are not yet available.

Appendix B

General Election Provisional Ballot Statistics of Comparable States Based on Population<sup>1</sup>

State	Year	Total Provisional Ballots Cast	Provisional Ballots Counted (Full or Partial)	Provisional Ballots Rejected	Percentage Rejected
Wisconsin	2004	374	119	255	68.2%
Maryland	2004	48,936	31,860	17,076	34.9%
Missouri	2004	8,183	3,292	4,891	59.8%
Tennessee	2004	8,788	3,298	5,490	62.5%
Washington	2004	93,781	74,100	19,681	21.0%
Wisconsin	2006	271	168	103	38.0%
Maryland	2006	41,485	36,146	5,339	12.9%
Missouri	2006	7,403	3,282	4,121	55.7%
Tennessee 2006 Not Available					
Washington	2006	18,825	16,049	2,776	14.7%
Wisconsin	2008	211	94	117	55.5%
Maryland	2008	51,163	34,012	17,151	33.5%
Missouri	2008	6,934	1,737	5,162	74.4%
Tennessee	2008	4,392	1,622	2,770	63.1%
Washington <sup>2</sup>	2008	54,047	31,071	11,547	21.4%
Wisconsin	2010	64	31	33	51.6%
Maryland	2010	37,339	34,142	3,197	8.6%
Missouri	2010	3,713	1,583	2,049	55.2%
Tennessee	2010	641	226	415	64.7%
Washington	2010	6,061	4,473	1,509	24.9%

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<sup>&</sup>lt;sup>1</sup> Provisional Ballot Statistics are based on the information reported by each state for the Election Assistance Commission's (EAC) "Election Administration and Voting Survey" (EAVS) that is submitted biannually by each state to the EAC.

<sup>&</sup>lt;sup>2</sup> The 2008 Statistics reported in the EAVS by the State of Washington included 11,429 provisional ballots categorized as *OTHER DISPOSITION*, without providing any explanation.

#### Appendix C

#### Department of Transportation Draft Response

#### National Voter Registration Act – Impacts on WisDMV

1. **Change the DL and ID paper applications** to include all the requirements of a voter registration application. This application supplement must not request duplicative information, other than a 2<sup>nd</sup> signature (including attestation). Unclear at this point whether new versions will require additional pages.

## PROPOSED COST FOR NEW FORMS: \$10,000 additional annually (to accommodate extra pages)

2. Amend all online DL/ID transactions (change address, dup ID/DL, ID renewal, reinstatement) to include language allowing the customer to register, decline registration, or change registration location. While a paper application is not used for these transactions, the data must be shared with the state election official for customers who request voter registration (and those who decline).

#### IT COST:

3. **Train DMV service center staff** to answer basic questions about voter registration options, whether registration is needed, etc.

**Hire additional staff** to avoid increasing wait times in service centers. Additional information is needed from other states to better understand the impact on all DL/ID (1.2M per year) transaction times.

#### FTE/TRAINING COSTS:

4. Send all DL/ID applications with a completed voter registration form to GAB.

<u>Option 1:</u> All applications are scanned by DMV. Forward the scanned images to GAB directly. This option assumes electronic (scanned) signature is acceptable. This option must also include forwarding all information obtained via an online DL/ID transaction. This option assumes digital (coded message attached to document which connects customer to the file) signature is acceptable.

#### IT COST:

<u>Option 2:</u> Forward the scanned images to GAB directly AND forward data file separately which includes <u>in person and online</u> registration data (to negate the need to re-key customer information from scanned images).

#### IT COST:

Option 3: Mail all hard-copy applications to GAB. Send all information obtained via an online DL/ID transaction.

#### IT COST:

#### **ASSUMPTIONS:**

- DMV service centers will NOT be named "voter registration agencies", and thus will not be responsible for registering voters independent of the DL/ID application process.
- DMV will NOT forward voter registration application materials to <u>local</u> election officials.
   DMV does not have the means to maintain this network of local contacts, or make the necessary determinations of customer's voting district/ward, etc. DMV prefers to offer a regularly scheduled batch data file to one central repository, which can populate the registration database directly.
- DMV does NOT have the capacity to create paper applications from online DL/ID transactions. Because DMV does not propose to shut off these online alternatives, GAB will need to have the capacity (statutory and system) to collect this registration information via a data file, rather than via a scanned or paper copy of an application.
- DMV will NOT be impacted by public disclosure of voter registration activity requirements.
   DMV assumes that GAB will maintain files (at least 2 years in duration) regarding programs and activities conducted to ensure the accuracy and currency of official lists of eligible voters.
- In general, DMV assumes that it is only responsible for §1973gg-3 (Simultaneous application for voter registration and application for motor vehicle driver's license) of NVRA.

#### **QUESTIONS:**

- Because the NVRA indicates that the voter registration application form for elections shall be <u>part</u> of an application for a State motor vehicle driver's license, can DMV forward the entire DL/ID application to GAB? Need to check DPPA and SSA agreements to see what limits there may be with sharing this personal data. Additional information is needed from other states under NVRA to see how this information is handled.
- A comparison between the state DL/ID applications and the state voter registration application has been conducted. The following information is currently on the state voter registration forms <u>only</u>, or is specifically required under NVRA. Are all of these data elements required? These supplemental data fields would <u>not</u> be included/populated in the DL/ID Issuance system (except for what would be needed for #13 or #14, or what might make sense to add for DMV business purposes), and thus would not be shared electronically.
  - 1) Municipality (Town, Village and City) in addition to residence and mailing address
  - 2) E-Mail Address
  - 3) Phone Number
  - 4) Military or Permanent Oversees designation
  - 5) Previous address
  - 6) Accommodation needed at poll location?
  - 7) Interested in being a poll worker?
  - 8) If you don't have a street number or address, space to draw a map of your address
  - 9) Attestation

- 10) Signature of Elector and Date Signed , including a notation that falsification on the form is punishable under Wisconsin law as a Class A felony
- 11) Signature of Assistant is Elector is unable to sign due to physical disability
- 12) Official's Signature we currently collect Processor Signature
- 13) Per NVRA need a statement that, if an applicant declines to register to vote, the fact that applicant has declined to register will remain confidential and will be used only for voter registration purposes.
- 14) Per NVRA need a statement that if an applicant does register to vote, the office at which the applicant submits a voter registration application will remain confidential and will be used only for voter registration purposes

#### Appendix D

#### **Provisional Ballots**

#### 1. Provisional Voting

In Wisconsin, provisional voting is currently ONLY used in two situations:

- 1. If an individual is a first-time voter, who registered by mail and has failed to provide the required proof of residence, he or she may vote provisionally.
  - a. The poll list will contain the watermark "POR Required" to identify those first-time voters who registered by mail and who must show proof of residence before being allowed to vote.
  - b. If an individual fails to provide the required proof of residence he or she may vote provisionally.
  - c. In the case of a first-time voter who voted absentee, the returned absentee ballot will be treated as provisional if no proof of residence has been provided with the returned absentee ballot.
- 2. If an individual who registers on **Election Day** has a Wisconsin driver license, but is unwilling or unable to provide the license number, he or she may vote provisionally.
  - a. Individuals who have a Wisconsin driver license may NOT use the last four (4) digits of their Social Security number.
  - b. Electors may vote provisionally if providing the driver license number is the only missing registration element. If an elector is also missing required proof of residence, then he or she may NOT register or vote.

There is no other situation in which provisional voting should be used. Provisional ballots are NOT given when a voter is at the wrong polling place. If a voter appears at the wrong polling place, he or she should be directed to the proper location.

Provisional ballots are also NOT given when a person is attempting to register in person at the polling place and does not provide the required proof of residence. He or she may not register or vote.

Each elector issued a provisional ballot must be provided a Provisional Voting Information Sheet. This sheet must include how or where the elector is to contact the municipal clerk or deputy to provide the missing information.

Electors have until 4:00 p.m. on the Friday following the election to provide the missing information to the municipal clerk or deputy. The municipal clerk must be available to receive this information from the elector.

#### Procedure

Once it is determined a voter will vote provisionally, the following procedures are required:

- 1. Every provisional voter must complete a Provisional Ballot Certificate Envelope (GAB-123).
- 2. The voter completes the certificate envelope in the presence of at least one election inspector by providing:
  - a. Full name
  - b. Complete address, including municipality and county
  - c. Date of birth
  - d. Indication of U.S. Citizenship
  - e. Date of election
  - f. Signature and date
- 3. The election inspector completes the certificate envelope by:
  - a. Signing and dating the certificate envelope
  - b. Indicating the type of required information (either "Proof of Residence," or "Driver License Number.") by checking the appropriate box(es) on the certificate envelope. A provisional ballot may be issued for more than one reason.
- 4. The election inspector issues a provisional voter number (PV#), which is recorded on the voter list. A voter number is NOT issued to the elector at this time and the elector does NOT sign the poll list.
  - a. This number is issued sequentially, starting with "1."
  - b. The PV# is also recorded in six places:
    - (1) The back of the ballot
    - (2) On the Inspectors' Statement (GAB-104)
    - (3) On the Provisional Ballot Certificate Envelope (GAB-123)
    - (4) On the Provisional Ballot Reporting Form (GAB-123r)
    - (5) On the poll list or supplemental poll list
    - (6) On the Provisional Voting Information sheet for the elector
- 5. The elector votes the ballot, seals the voted ballot in the Provisional Ballot Certificate Envelope (GAB-123), and returns the sealed envelope to the election inspector.
- 6. The sealed certificate envelope (GAB-123) is then placed inside the Inspectors' Certificate for Provisional Ballots Envelope (GAB-108).

- a. The election inspectors then record the name of the elector, the PV#, and the reason for the provisional ballot on the Provisional Ballot Reporting Form (GAB-123r) and on the Inspectors' Statement (GAB-104).
- b. The Inspectors' Certificate of Provisional Ballots Envelope (GAB-108) must be kept secure throughout Election Day.
- c. When the polling place closes, the Inspectors' Certificate of Provisional Ballots Envelope (GAB-108) must be secured in a separate ballot bag with a tamper evident serialized numbered seal. The serial number shall be recorded on the signed ballot container certification attached to the bag and on the Inspectors' Statement. The bag should be marked "Provisional Ballots."
- 7. Election inspectors must provide the elector with the Provisional Voting Information Sheet.
- 8. An elector who was issued a provisional ballot may return to the polling place before 8 p.m. to provide the missing documentation to the election inspectors. Election inspectors shall review the provided documentation to determine if it is satisfactory.
  - a. If the provided documentation is <u>not valid</u> the election inspectors shall inform the elector and document the incident on the Inspectors' Statement (GAB-104).
  - b. If the provided documentation is valid:
    - i. The elector must sign the poll or supplemental list.
    - ii. Note on the Inspectors' Statement (GAB-104) that the elector provided the required documentation.
    - iii. Initial and date the Provisional Ballot Reporting Form (GAB-123r) to indicate that the elector provided the required documentation.
    - iv. Election inspectors should offer the elector the option of spoiling the provisional ballot and voting a new ballot.
    - v. If the elector chooses to spoil the provisional ballot:
      - 1. The Provisional Ballot Certificate Envelope (GAB-123) is removed from the Inspectors' Certificate of Provisional Ballots (GAB-108) envelope and given to the elector.
      - 2. The elector should remove the provisional ballot and spoil it.
      - 3. Document the incident and spoiled ballot on the Inspectors' Statement (GAB-104).
      - 4. The elector signs the poll list.
      - 5. The elector is issued a sequential voter number, which is recorded on the poll list and noted on the Provisional Ballot Reporting Form (GAB-123r) by marking "on poll list" in the column labeled "Voter Number Issued."

- 6. The elector is given a new ballot.
- vi. If the elector chooses to cast the provisional ballot:
  - 1. Note on the Inspectors' Statement (GAB-104) and initial and date the Provisional Ballot Reporting Form (GAB-123r) that the elector provided the required documentation.
  - 2. Remove the elector's Provisional Ballot Certificate Envelope (GAB-123) from the Inspectors' Certificate of Provisional Ballots (GAB-108) envelope.
  - 3. Verify that the Provisional Ballot Certificate Envelope (GAB-123) has not been opened or tampered with.
    - a. If the Provisional Ballot Certificate Envelope (GAB-123) has been tampered with, the election inspectors shall spoil the provisional ballot and instruct the elector to cast a new ballot.
  - 4. The elector signs the poll list.
  - 5. The elector is issued a sequential voter number, which is recorded on the poll list and noted on the Provisional Ballot Reporting Form (GAB-123r) by marking "on poll list" in the column labeled "Voter Number Issued."
  - 6. Provide the elector with the Provisional Ballot Certificate Envelope (GAB-123) and instruct him or her to remove the ballot and place it in the ballot box or voting equipment.
  - 7. Collect the used Provisional Ballot Certificate Envelope (GAB-123) from the elector and place it back in the Inspectors' Certification of Provisional Ballots (GAB-108) envelope.

#### **Processing**

- 1. A Provisional Ballot Reporting Form (GAB-123r) must be completed by the election inspectors at the polling place listing all of the electors who cast a provisional ballot. The clerk must review the form and send a copy to both the county clerk and their SVRS provider if different after the close of polls on Election Day. The municipal clerk must keep a copy for his or her office. A blank Provisional Ballot Reporting Form is available on the agency website and a sample for reference may be found in the appendix of this manual.
- 2. All electors who have been issued a provisional ballot must be tracked in SVRS on election night. SVRS must also be updated if/when an elector provides the missing information.
  - a. Self-Providers must enter the information into SVRS. Please see the SVRS Application Training Manual for details.
  - b. Reliers must provide the Provisional Ballot Reporting Form (GAB-123r) to their Provider. Reliers must inform their Provider with updates if/when electors provide the missing information.

- c. Providers must enter provisional ballot information into SVRS on election night on behalf of their reliers. Please see the SVRS Application Training Manual for details.
- 3. Provisional ballots are maintained by the Municipal Clerk (NOT delivered to the County Clerk with all other election materials).
- 4. Provisional ballots are not counted until the required information (either proof of residence or driver license number) is provided to either the election inspectors by the close of the polls, or to the municipal clerk or deputy by 4 p.m. on the Friday after the election.
  - a. Electors who provide their information after Election Day do not sign the poll list.
- 5. If the person voting provisionally does not present the information to the municipal clerk by 4 p.m. on the Friday after the election the Provisional Ballot Certificate Envelope (GAB-123) is not opened. Neither the voter nor the ballot is counted as part of the Election Day results if the missing required information is not returned by the deadline.
- 6. The municipal clerk should maintain communication with the county clerk regarding the number of outstanding provisional ballots.

#### 2. Processing Provisional Ballots Post Election

The MBOC will conduct the processing and tallying of provisional ballots.

#### Provisional Ballots

- A. Examine all GAB-123r forms to determine which voters have supplied the missing information necessary for their ballots to be processed.
- B. Verify the tamper-evident seal numbers on the ballot container holding the provisional ballots and record the findings on the Record of Activity (GAB-104AP).
- C. Open the ballot container holding the Election Day provisional ballots and retrieve the envelopes containing the ballots to be processed.
- D. Process one provisional ballot at a time. Examine the Provisional Ballot Certificate Envelope (GAB-123) for sufficiency.
  - 1. Reject the provisional ballot if the envelope is not sufficient or appears to have been tampered with.
    - a. Mark the envelope (GAB-123) "Rejected."
    - b. Write "Rejected" on the Provision Ballot Reporting Form (GAB-123r) in the "voter number" column.
    - c. Record the rejection on the Record of Activity (GAB-104AP)
    - d. Return the unopened GAB-123 to the Election Night Provisional Ballot Bag/Container.
  - 2. If the provisional ballot envelope is sufficient
    - a. Assign a voter number to the elector.
      - i. Look for the last voter number issued in the appropriate reporting unit and assign the next consecutive number to the voter.
      - ii. Record the number on the GAB-123r.
  - b. Place the Provisional Certificate Envelope in a large envelope marked "Used Provisional Ballot Envelopes."
  - c. Place the ballot in the "privacy container" for tally later in the process.
- E. After all provisional ballots have been processed, reconcile the number of voters with the number of provisional ballots
  - 1. Count the number of ballots in the privacy container to ensure the number of ballots equals the number of additional voter numbers issued for provisional ballots.
  - 2. Return ballots to privacy container and mix.

#### F. Tally the Votes

Count and record the votes on two separate Tally Sheets (GAB-105). Reconcile the tally sheets when the counting for each office is complete.

- 1. Determine if any of the ballots are "Defective."
  - a. A "Defective ballot" is a ballot for which a majority of the election inspectors agree that voter intent cannot reasonably be determined.
  - A ballot can be defective for some offices and valid for others.
     Only valid votes on each ballot are counted. The reason for the defect should be recorded on the Record of Activity (GAB-104AP).
  - c. A defective ballot is labeled "Defective Ballot # \_\_" (beginning with '1'), set aside and preserved.
  - i. Defective ballots may be placed in an envelope marked "Defective/Objected To Provisional Ballots or"
  - ii. Bundled together and labeled "Defective Provisional Ballots"
- 2. Determine if any of the ballots are "Objected To."
  - a. An "Objected to" ballot is a ballot for which a majority of the election inspectors agree that voter intent can be determined, but at least one election inspector disagrees. The reason for the objection is recorded on the Record of Activity (GAB-104AP).
  - b. An "Objected to" ballot is labeled "Objected to Ballot #\_\_" (beginning with '1'), set aside and preserved.
    - i. "Objected To" ballots may be placed in an envelope marked "Defective/Objected To Provisional Ballots or"
    - ii. Bundled together and labeled "Objected To Provisional Ballots"
  - c. Bundle the counted provisional ballots together and set aside.
  - d. Announce the results of the tally of provisional ballots.

#### Securing and Documenting

#### A. Ballots

- 1. Place the counted provisional ballots and the Defective/Objected To Provisional Ballots in a ballot bag or container.
  - a. Secure the container with a tamper-evident seal.
  - b. Record the tamper-evident seal number on the Ballot Container Certificate (GAB-101) and the Record of Activity (GAB-104AP)

- 2. Reseal the ballot container holding the Election Day provisional ballots with a tamper-evident seal.
  - a. Record the tamper-evident seal number on the Ballot Container Certificate (GAB-101) and the Record of Activity (GAB-104AP).

#### B. Envelopes

- 1. Secure the large envelopes containing
  - a. Used Certificate Absentee Envelopes (GAB-103)
  - b. Rejected Absentee Ballots (GAB-102)
  - c. Used Provisional Certificate Envelopes
- C. Complete Forms and Sign any Certifications
  - 1. Ballot Container Certificates (GAB-101)
  - 2. Rejected Absentee Ballots Envelopes (GAB-102)
  - 3. Used Absentee Certificates Envelope (GAB-103)
  - 4. Used Provisional Certificates Envelope
  - 5. Record of Activity (GAB-104AP)
  - 6. Certification of the MBOC (GAB-106AP)
  - 7. Tally sheets and machine tapes (GAB-105)
  - 8. Provisional Ballot Carrier Envelope (GAB-108)
  - 9. Provisional Ballot Reporting Form (GAB-123r)
  - 10. Absentee Ballot Log (GAB-124)

#### Appendix E

#### **EDR Study Taskforce Membership**

#### Government Accountability Board Staff Members

- Richard Rydecki, Elections Specialist, Co-Lead
- Brian Bell, Elections Data Manager, Co-Lead
- Ross Hein, Elections Supervisor
- Diane Lowe, Lead Elections Specialist
- Allison Coakley, Elections Training Officer
- Adam Harvell, Campaign Finance Auditor and Ethics Specialist
- Ann Oberle, SVRS UAT Lead Tester
- Meagan Wolfe, Voter Services and Outreach Elections Specialist
- Steve Rossman, IS Technical Services Senior
- Sharrie Hauge, Chief Administrative Officer
- David Grassl, IT Development Team Director
- Reid Magney, Communications Director
- Ashley Davis, UW Law Student Intern
- Kathleen Marschman, UW Law Student Intern
- Michael Haas, Staff Counsel
- Project Sponsor: Kevin Kennedy, Director and General Counsel

#### Members Representing Other State Agencies

- Kristina Boardman, Director of DMV Field Services, Department of Transportation, representing Secretary Mark Gottlieb
- Georgia Maxwell, Executive Assistant, Department of Workforce Development, representing Secretary Reggie Newson
- Joan Hanson, Deputy Secretary, Department of Children and Families, representing Secretary Eloise Anderson
- Kevin Moore, Executive Assistant, Department of Health Services, representing Secretary Dennis Smith

#### Organizations Representing Local Government Interests on a Statewide Basis

- Wisconsin Towns Association
- Wisconsin County Clerks Association
- Wisconsin Municipal Clerks Association